

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

EPIC GAMES, INC.,  
*Plaintiff, Counter-defendant,*  
v.  
APPLE INC.,  
*Defendant, Counterclaimant.*

Case No. 4:20-cv-05640-YGR-TSH

**JOINT STATUS REPORT**

The Honorable Thomas S. Hixson  
San Francisco Courthouse  
Courtroom E - 15th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Dear Magistrate Judge Hixson,

Pursuant to Your Honor's Discovery Standing Order, the Parties in the above-captioned action respectfully submit this joint statement related to the evidentiary hearing concerning Plaintiff Epic Games, Inc.'s ("Epic") Motion to Enforce Injunction (Dkt. 897 (the "Motion")).

Respectfully submitted,

CRAVATH, SWAINE  
& MOORE LLP

By: /s/ Yonatan Even  
Yonatan Even  
*Counsel for Epic Games,*  
*Inc.*

WEIL, GOTSHAL  
& MANGES LLP

By: /s/ Mark A. Perry  
Mark A. Perry  
*Counsel for Apple Inc.*

**Epic's Position:**

Since the Parties' last Joint Status Report, the Special Masters have continued their review of Apple's re-reviewed production for claims of privilege. The Special Masters have just over 1,600 documents remaining to review as of the afternoon of Tuesday, April 29, 2025. The Special Masters appear likely to complete their review by their stated goal of May 15, 2025. (Dkt. 1459.)

At this time, Epic does not believe a status conference before Your Honor is necessary.

**Apple's Position:**

As of Tuesday evening, the Special Masters have reviewed approximately 22,124 documents and have approximately 1,652 remaining to review. Of the total documents they have reviewed so far, the Special Masters have sustained in full about 94.75% of Apple's privilege assertions, sustained in part about .38% of the assertions, and overruled in full about 4.39% of the assertions. The Special Masters have requested additional information related to about .47% of the documents.

Apple respectfully submits there are no issues before Your Honor for resolution except the pending objections to certain of the Special Masters' determinations. Apple submits it does not have any items requiring discussion at the status conference, but as always, is prepared to attend should Your Honor have any issues to discuss with the parties.

Respectfully submitted,

DATED: May 1, 2025

CRAVATH, SWAINE & MOORE LLP  
By: /s/ Yonatan Even  
*Counsel for Plaintiff Epic Games, Inc.*

WEIL, GOTSHAL & MANGES LLP  
By: /s/ Mark A. Perry  
*Counsel for Defendant Apple Inc.*